

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI

In Re:) Case No.: 14-41646-659
)
REBECCA A. ADAMS,) Chapter 13
)
Debtor.)

OBJECTION TO CHAPTER 13 BANKRUPTCY PLAN

The Bank of New York Mellon, as Trustee, by and through its duly authorized servicing agent, Vanderbilt Mortgage and Finance, Inc., successor servicer to Oakwood Acceptance Corporation, LLC (Formerly Oakwood Acceptance Corporation) ("Vanderbilt"), as secured creditor herein, objects to Debtor's Chapter 13 Bankruptcy Plan on the following grounds:

1. Vanderbilt holds a claim secured by a 1999 Oakwood Mobile/Manufactured Home, VIN #HOTN12C08709, 76 x 16, including all fixtures therein (the "Property"). The current payoff is approximately \$24,598.55.

2. The Chapter 13 Bankruptcy Plan states that the fair market value of the Property is \$12,031.20. However, the NADA value of the Property is actually \$15,488.64.

WHEREFORE, The Bank of New York Mellon, as Trustee, by and through its duly authorized servicing agent, Vanderbilt Mortgage and Finance, Inc., successor servicer to Oakwood Acceptance Corporation, LLC (Formerly Oakwood Acceptance Corporation) respectfully requests that the Court deny confirmation of the Plan.

/S/David G. Wasinger

David G. Wasinger, MoBar #38253
James S. Cole, MoBar #26787
THE WASINGER LAW GROUP, P.C.
Magna Place, Suite 875
1401 S. Brentwood Blvd.
St. Louis, MO 63144
(314) 961-0400
(314) 961-2726 FAX
dwasinger@wasingerlawgroup.com
Attorneys for Movant

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served electronically upon the the U.S. Trustee, according to the Court's electronic notice procedures, and that a further copy was mailed by U.S. Mail, postage prepaid, this 7th day of April, 2014, to:

Brent S. Westbrook, Esq., Attorney for Debtor
Westbrook Law Group, LLC
515 Jefferson Street, Suite C
St. Charles, Missouri 63301

John V. LaBarge, Jr., Trustee
P.O. Box 430908
St. Louis, Missouri 63143

Rebecca A. Adams
1824 Santa Paula Street
St. Charles, Missouri 63303

/S/David G. Wasinger